

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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|------------------------------------------|---|--------------------------|
| In re:                                   | ) | Chapter 11               |
|                                          | ) |                          |
| JOANN INC., <i>et al.</i> , <sup>1</sup> | ) | Case No. 25-10068 (CTG)  |
|                                          | ) |                          |
| Debtors.                                 | ) | (Jointly Administered)   |
|                                          | ) |                          |
|                                          | ) | <b>Re: Docket No. 17</b> |

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**NOTICE OF MOTION OF DEBTORS FOR  
ENTRY OF AN ORDER (I) APPROVING BIDDING  
PROCEDURES, (II) SCHEDULING CERTAIN DATES AND  
DEADLINES WITH RESPECT THERETO, (III) APPROVING  
THE FORM AND MANNER OF NOTICE THEREOF,  
(IV) APPROVING THE STALKING HORSE AGREEMENT,  
(V) ESTABLISHING NOTICE AND PROCEDURES FOR THE  
ASSUMPTION AND ASSIGNMENT OF CONTRACTS AND LEASES,  
(VI) AUTHORIZING THE ASSUMPTION AND ASSIGNMENT  
OF ASSUMED CONTRACTS AND LEASES, (VII) APPROVING  
THE SALE OF ASSETS, AND (VIII) GRANTING RELATED RELIEF**

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**PLEASE TAKE NOTICE** that on January 15, 2025, the above-captioned debtors and debtors in possession (collectively, the “Debtors”), by and through their undersigned proposed counsel, filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) the *Motion of Debtors for Entry of an Order (I) Approving Bidding Procedures, (II) Scheduling Certain Dates and Deadlines With Respect Thereto, (III) Approving the Form and Manner of Notice Thereof, (IV) Approving the Stalking Horse Agreement, (V) Establishing Notice and Procedures for the Assumption and Assignment of Contracts and Leases, (VI) Authorizing the Assumption and Assignment of Assumed Contracts and Leases, (VII) Approving the Sale of Assets, and (VIII) Granting Related Relief* [Docket No. 17] (the “Motion”).

**PLEASE TAKE FURTHER NOTICE** that a copy of the Motion is available on (i) the Court’s website: [www.deb.uscourts.gov](http://www.deb.uscourts.gov) and (ii) the website maintained by the Debtors’ Claims and Noticing Agent, Kroll Restructuring Administration LLC, <https://cases.ra.kroll.com/Joann2025>.

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

**PLEASE TAKE FURTHER NOTICE** that a hearing on the Motion will be held on **February 11, 2025 at 2:00 p.m. (prevailing Eastern Time)** before The Honorable Craig T. Goldblatt, United States Bankruptcy Court for the District of Delaware, 3rd Floor, Courtroom No. 7, 824 North Market Street, Wilmington, Delaware 19801.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the Motion and the entry of a final order approving the Motion must be filed on or before **February 4, 2025 at 4:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”)** with the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 North Market Street, Wilmington, DE 19801 and served upon the following parties so as to be actually received by the Objection Deadline: (a) the Debtors, JOANN Inc., 5555 Darrow Road, Hudson, Ohio 44236, Attn.: Ann Aber, EVP, Chief Legal and Human Resources Officer; (b) proposed co-counsel to the Debtors (i) Kirkland & Ellis LLP, 601 Lexington Avenue, New York, New York 10022, Attn.: Aparna Yenamandra, P.C. (aparna.yenamandra@kirkland.com) and 333 West Wolf Point Plaza, Chicago Illinois 60654, Attn.: Jeffrey Michalik (jeff.michalik@kirkland.com) and Lindsey Blumenthal (lindsey.blumenthal@kirkland.com) and (ii) Cole Schotz P.C., 500 Delaware Avenue, Suite 1410, Wilmington, Delaware 19801, Attn.: Patrick J. Reilley (preilley@coleschotz.com), Stacy L. Newman (snewman@coleschotz.com), Michael E. Fitzpatrick (mfitzpatrick@coleschotz.com), and Jack M. Dougherty (jdougherty@coleschotz.com); (c) the United States Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801, Attn.: Malcolm M. Bates (malcolm.m.bates@usdoj.gov); (d) counsel to the Prepetition ABL Agent, Morgan, Lewis & Bockius LLP, One Federal Street, Boston, Massachusetts 02110, Attn.: Christopher L. Carter (christopher.carter@morganlewis.com) and Marjorie Crider (marjorie.crider@morganlewis.com); (e) counsel to the Prepetition FILO Agent, Choate Hall & Stewart LLP, 2 International Place, Boston, Massachusetts 02110, Attn.: John Ventola (jventola@choate.com) and Jonathan Marshall (jmarshall@choate.com); (f) counsel to the Prepetition Term Loan Lender Ad Hoc Group, Gibson, Dunn & Crutcher LLP, 200 Park Avenue New York, New York 10166, Attn.: Scott Greenberg (SGreenberg@gibsondunn.com), Kevin Liang (KLiang@gibsondunn.com), and Josh Brody (JBrody@gibsondunn.com); (g) counsel to the Prepetition Term Loan Agent, ArentFox Schiff LLP, 1301 Avenue of the Americas, 42nd Floor, New York, New York 10019, Attn.: Jeffrey Gleit (jeffrey.gleit@afslaw.com), 1717 K Street NW, Washington, D.C. 20006, Attn.: Jonathan Bagg (jonathan.bagg@afslaw.com), and 233 South Wacker Drive, Suite 7100, Chicago, Illinois 60606, Attn.: Matthew Bentley (matthew.bentley@afslaw.com); (h) counsel to Gordon Brothers Retail Partners, LLC, Katten Muchin Rosenman LLP, 50 Rockefeller Plaza, New York, New York 10020, Attn.: Steven Reisman (sreisman@katten.com) and Cindi Giglio (cgiglio@katten.com); and (i) any statutory committee appointed in these chapter 11 cases.

**PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION AND ENTER A FINAL ORDER WITHOUT FURTHER NOTICE OR HEARING.**

Dated: January 17, 2025  
Wilmington, Delaware

*/s/ Patrick J. Reilley*

**COLE SCHOTZ P.C.**

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and Debtors in Possession*

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